

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

KEVIN BROWN, individually and on behalf of
all others similarly situated, *et al.*,

Plaintiffs,

v.

SAINT-GOBAIN PERFORMANCE
PLASTICS CORPORATION, *et al.*,

Defendants.

Civil Action No. 1:16-cv-00242-JL

**DEFENDANTS' MOTION TO EXCLUDE
PLAINTIFFS' CLASS CERTIFICATION EXPERTS**

Pursuant to Rules 403 and 702 of the Federal Rules of Evidence, Defendants Saint-Gobain Performance Plastics Corporation and Gwenael Busnel (together, "Defendants"), by and through their undersigned attorneys, respectfully move this Court to enter an order excluding the testimony of Plaintiffs' class certification experts, Dr. Philippe Grandjean, Dr. Scott Bartell, David Sullivan, Dr. James Vernon, and Dr. Randell Bell.

1. In support of their motion, and pursuant to L.R. 7.1(a)(2), Defendants submit the accompanying memorandum of law, filed together herewith.

2. Due to the nature of the relief requested, undersigned counsel did not seek the assent of counsel for Plaintiffs.

WHEREFORE, Defendants Saint-Gobain Performance Plastics Corporation and Gwenael Busnel respectfully request that the Court:

A. Enter an order excluding the testimony of Plaintiffs' class certification experts;
and

B. Award such other and further relief this Court shall deem just and proper.

Dated: September 6, 2019

Respectfully submitted,

/s/ Jeremy T. Walker

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Gwenael Busnel*

CERTIFICATE OF SERVICE

I hereby certify on this 6th day of September, 2019, this document was filed through the Electronic Case Filing System of the United States District Court for the District of New Hampshire and will be served electronically by the court to the Registered Participants identified in the Notice of Electronic Filing (NEF).

Dated: September 6, 2019

/s/ Jeremy T. Walker

Jeremy T. Walker